

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**PURDUE PHARMA L.P., et al.,

Debtors.¹**

Chapter 11

Case No. 19-23649 (RDD)

Jointly Administered

**SUPPLEMENTAL DECLARATION OF REGINALD BROWN IN SUPPORT OF
APPLICATION OF DEBTORS FOR AUTHORITY TO RETAIN AND EMPLOY
WILMER CUTLER PICKERING HALE AND DORR LLP AS SPECIAL COUNSEL
NUNC PRO TUNC TO THE PETITION DATE**

I, Reginald Brown, declare as follows:

1. I am a partner in the firm of Wilmer Cutler Pickering Hale and Dorr LLP (“WilmerHale” or the “Firm”) and practice out of the Firm’s offices located at 1875 Pennsylvania Avenue, N.W., Washington, D.C. 20006.

2. On November 5, 2019, the Debtors filed their Application of Debtors for Authority to Retain and Employ Wilmer Cutler Pickering Hale and Dorr LLP as Special Counsel *Nunc Pro Tunc* to the Petition Date [Dkt. No. 428] (the “Application”). In support of the Application, I submitted a declaration (the “Original Declaration”) attached to the Application as Exhibit B. On November 25, 2019, this Court entered the Order Authorizing the Retention and

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Employment of Wilmer Cutler Pickering Hale and Dorr LLP as Special Counsel for the Debtors
Nunc Pro Tunc to the Petition Date [Dkt. No. 544].

3. In paragraph 14 of the Original Declaration, I stated that “WilmerHale has represented two of the Potential Parties in Interest in connection with inquiries or litigation matters relating to the distribution or production of opioid products, but not with respect to the WilmerHale Services, and none of those representations were or are adverse to the Debtors. In one of those matters, WilmerHale represents a co-defendant with the Debtors, but WilmerHale does not believe any current adversity exists between the co-defendant and the Debtors (and, even if such adversity existed, it would not be related to the WilmerHale Services).” While that statement remains correct, WilmerHale has also initiated and may in the future initiate additional, similar representations. Accordingly, through this supplemental declaration, I amend this statement from the Original Declaration and restate it as follows: “In connection with inquiries or litigation matters relating to the distribution or production of opioid products, WilmerHale represents and may represent in the future various Potential Parties in Interest,² some of whom are or may become co-defendants with the Debtors, but WilmerHale does not believe any current adversity exists between any such co-defendants and the Debtors (and, even if such adversity existed, it would not be related to the WilmerHale Services).”

4. Pursuant to 28 U.S.C. § 1746, I declare that the foregoing is true and correct to the best of my knowledge.

² As the list of Potential Parties in Interest, as defined in the Original Declaration, may be updated by the Debtors from time to time.

Dated: January 10, 2020
New York, New York

By: /s/ Reginald Brown
WILMER CUTLER PICKERING HALE
AND DORR LLP

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*Special Counsel to the Debtors and Debtors
in Possession*